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January 12, 2001

Jane E. Henney, M.D.
Commissioner US FDA
5600 Fishers Lane
Rockville, MD 20857

Dear Dr. Henney:

It seems that everybody agrees: antibiotics are overused, especially in agriculture. Nobody denies that this overuse is a big factor in the rise of antibiotic resistance. A reasonable, scientifically valid campaign to counteract this dangerous development, however, is hampered by a lack of reliable data.

In the just released report *Hogging It!*, the Union of Concerned Scientists (UCS) attempts to address this lack of data by estimating antibiotic use in US agriculture. That's commendable but not enough. I think the FDA should establish a national reporting system to determine the quantity of antibiotics used in US agriculture. Undoubtedly such reporting would be opposed by industry, more "red tape" is the outcry. Understandable, but not justified. The few reports about multiple resistances I have seen in *Chemical and Engineering News* alone are frightening. Any data used to curb the non-therapeutic use of antibiotics have to be government-guaranteed. The UCS report would be rejected as biased.

So, I would urge you and FDA to establish a reporting system, and I would add: do it now. Who knows, maybe it's exactly what "compassionate conservatism" wants to do. But even if not: a lot of human health is on the line in the near future when antibiotic resistance increases. That should be enough reason for any Administration to start building a reliable data base for future action.

I suspect that this letter is "preaching to the choir". Yet it might be useful to show you that support for reasonable measures exists in the general population. I'm a retired chemist, so I don't have any axe to grind in this matter, neither pro or con. I do hope you will succeed in establishing a national reporting system.

Thank you.

Sincerely yours,

Wolfgang Benz

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